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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

DREAM COLLECTIVE, INC., a  
 California corporation;

Plaintiff,

vs.

MADEWELL, INC, a Delaware  
 corporation; J. CREW, INC., a  
 Delaware corporation; J. CREW  
 GROUP, INC., a Delaware corporation;  
 MAURICE MAX, INC. D/B/A LEE  
 ANGEL., a New York Corporation; and  
 DOES 1 through 10, inclusive,

Defendants.

Case No. 2:15-cv-07871 RSWL-JPR  
 Hon. Ronald S. W. Lew

**STIPULATION TO EXTEND TIME  
 TO RESPOND MORE THAN 30  
 DAYS**

**[Proposed Order]**

Complaint served: October 24, 2015  
 Original response date: November 14,  
 2015  
 Current response date: January 13,  
 2016  
 New response date: January 27,  
 2016

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for DREAM COLLECTIVE, INC., (“Plaintiff”) and MADEWELL, INC., J. CREW, INC., J. CREW GROUP, INC. and MAURICE MAX, INC. D/B/A LEE ANGEL (“Defendants”) that the deadline for Defendants to answer or otherwise respond to Plaintiff’s Complaint dated October 7th, 2015 is extended through to January 27th 2016. This extension is necessary as the parties are diligently pursuing amicable settlement, and require more time to agree on, and finalize settlement terms.

1 IT IS FURTHER STIPULATED AND AGREED that Defendants hereby  
2 waive all defenses relating to personal jurisdiction, including, without limitation, in  
3 connection with defects in service, subject matter jurisdiction and venue and agrees  
4 not to make any motion to dismiss or contest this action on the basis of any such  
5 waived defense.

6 IT IS FURTHER STIPULATED AND AGREED by and between the  
7 undersigned attorneys for Plaintiff and Defendants that PDF and facsimile  
8 signatures shall be deemed original signatures for all purposes under this  
9 Stipulation.

10 Dated: January 12, 2016  
11 Los Angeles, California

Dated: January 12, 2016  
New York, New York

12 **ERIKSON LAW GROUP**  
13 *Attorneys for Plaintiff*

**LAZARUS & LAZARUS, P.C.**  
*Attorneys for Defendant*  
*Maurice Max, Inc.*

14  
15 By: /s/ David A. Erikson  
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By: /s/ Harlan M. Lazarus  
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19 Dated: January 12, 2016  
20 New York, New York

21 **COWAN LIEBOWITZ & LATMAN, P.C.**  
22 *Attorneys for Defendant Madewell, Inc.,*  
23 *J. Crew, Inc. and J. Crew Group, Inc.*

24 By: /s/ Thomas Kjellberg  
25 Thomas Kjellberg, Esq.  
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